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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW OF FINAL SOLID WASTE MANAGEMENT UNIT 2 COMPLETION REPORT AND
ASSOCIATED REPORT OF COMPLETION OF INTERIM MEASURE NS MAYPORT FL

9/20/1996

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 20, 1996

Mr. David Driggers
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC. 29419-9010

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RE: Review of Final SWMU 2 Completion Report, Bechtel Environmental Inc.
and associated Report of Completion of Interim Measure at SWMU 2 PCB
Area by ABB Environmental, NAVSTA Mayport

Dear David:

I have reviewed the above completion report by Bechtel Environmental dated May 8, 1996 (received May 10, 1996) and the associated oversight report from ABB Environmental Services dated July 26, 1996 (received July 30, 1996). I note that the purpose of the ABB report was to provide oversight for the interim removal action which was performed by Bechtel Environmental Inc. The ABB report indicates that the removal action met the objectives of the interim measure and I generally agree with this conclusion; however, the following points need to be addressed before final approval can be considered:

1. On page 8 of the Bechtel report it is stated that the confirmatory samples were obtained based on consideration of former high levels of contamination. In my letter of July 26, 1996, I noted the need to judge the number and location of confirmatory samples on the methods in the referenced book by Richard O. Gilbert. Please address the reasoning for the determination of the location and number of samples that were obtained.
2. Aquatec Laboratories, the laboratory which conducted the confirmatory analyses for PCBs, apparently does not possess a Florida COMPQAP. In April, I informally discussed with you that the originally-proposed laboratory, "Inchscape", from the same city (Colchester, VT) also did not possess this qualification. Please confirm the laboratory and its Florida approval status.
3. As stated in my letter of July 26, 1996, please furnish a properly signed and sealed certification by a Florida Registered Professional Engineer that the cleanup goals for the project were achieved.

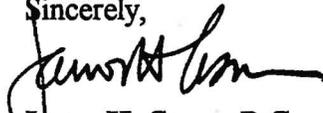
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Mr. David Driggers
September 20, 1996
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Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-4230.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Pat Kingcade, OGC/Trustee File
Terry Hansen, ABB Environmental Services, Tallahassee
Satish Kastury, FDEP Tallahassee
Brian Cheary, FDEP Northeast District, Jacksonville

Reviewed by:

TB B JJC JJC ESN ESN